

JPS

AMENDED COMPLAINT
(for filers who are prisoners without lawyers)

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

U.S. District Court
Wisconsin Eastern

APR 22 2024

FILED
Clerk of Court

(Full name of plaintiff)

Lou Archie Griffin,

v.

Case Number:

(Full name of defendant(s))

24-CV-53-JPS
(to be supplied by Clerk of Court)

Brown County Sheriff
Department and Brown
County Jail Medical Staff,

A. PARTIES

1. Plaintiff is a citizen of Wisconsin United States America and is located at
Racine Correctional Institution (State)
2019 Wisconsin St. P.O. Box 900 Startland WI 53177
(Address of prison or jail)

2. Defendant Brown County Sheriff & Jail Medical Staff
(Name)

is (if a person or private corporation) a citizen of Wisconsin
(State, if known)

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United States District Court
Eastern District of Wisconsin

Lou A. Griffin,

Plaintiff,

vs.

Case Number: 24-cv-53-JPS

Brown County Sheriff
Department and Brown
County Jail Medical Staff,

Defendants,

Plaintiff, ~~ad~~ here to The District Court's order
TO STATE a claim. TO STATE a claim for relief
under 42 U.S.C. § 1983, The Plaintiff will allege
that Brown County Sheriff Department, and The
Brown County Jail Medical Staff deprived him
of a right by The Constitution or the laws of
The United States and that Brown County Sheriff
Department and Brown County Jail Staff; was acting
under the color of law in The State of
Wisconsin.

Brown County Sheriff Department, and Brown
County Jail Medical Staff, resides at 3030 Curry
Lane, Green Bay, Wisconsin 54311. Defendants name
are, John Doe. TO Plaintiff, in these Department

(G)

B. STATEMENT OF CLAIM

at the present time. The Brown County Jail Medical Staff acted with Deliberate Indifference to my pain and suffering, while incarcerated in their care. The Sheriff Department, fail to address my medical needs, as provided under The Eight Amendment of The United States Constitution.

A Prisoner is protected by The Fourteenth Amendment of The United States Constitution from Deliberate Indifference, when Brown County Jail Staff allowed petitioner to become infected in February 2021, and then again in July of 2022. The Brown County Jail medical Staff; fail to protect the petitioner with adequate placement away from the COVID-19 inmates who had the infection.

The Brown County Jail medical Staff, ignored and fail to address my serious medical needs after petitioner went several times to the Medical Department, and complain about his health problems. Remembering the petitioner is a 18 year old male, who just had COVID-19; infections two times, and he was complaining about Headack, loss of sleep, Black-outs, Night sweats etc. It wasn't until after a R.N. John Doe, came into the Medical Staff for Brown County Jail, that the Medical Department for Brown County started to take notice of Petitioner's medical Record

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(3)

and call him down to the Medical Department to check his High Blood pressure. The Brown County medical staff then, gave Petitioner Two Aspirins, and sent him on his way for the headache; he was having. Brown County Jail staff, never address the issues of Night sweats, Black-outs, hot and cold issues.

Because of the laps of time for medical treatment, The Brown County Jail staff, and Sheriff Department, caused serious risk of substantial harm to petitioner Brain. While waiting on medical treatment, from The Brown County Medical Department, Petitioner never got X-Ray to pin-point the problem, like CAT-Scan, or MRI on the petitioner Brain.

The petitioner then noticing the Ear problem becoming more chronic and painful, went to Brown County Jail staff members John Doe to report his condition to the proper medical staff. Again, Petitioner was ignored, until the Petitioner had to be rushed to Aurora Bay-Port Hospital Emergency Room to save petitioner life with Emergency surgery, to save petitioner life on March 10, 2023.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff is different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$_____.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I The petitioner, want The Brown County and
it Sheriff Department, Plus The Brown County
Jail Staff, To Pay me 43,000,000 dollars
for my pain and suffering while in their
Jail; Custody.

The Brown County Jail medical staff, hire
outside medical help, and sometime those
people they hire; don't show up for work,
which leave inmates without medical attention,

E. JURY DEMAND

I want a jury to hear my case.



- YES



- NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 12 day of April 2024.

Respectfully Submitted,

Lou Archie Griffin
Signature of Plaintiff

85968

Plaintiff's Prisoner ID Number

RACINE Correctional Institution

2019 Wisconsin St. P.O. Box 900

(Mailing Address of Plaintiff)

Sturtevant, WI 53177-0900